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June 30, 2021

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 443
New York, NY 10007

USDC SDNY
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Re: *Hugh M. Rhoden, Sr. v. C.R. Bard, Inc. et al.*, Civ. No. 1:21-cv-01677-VEC

Dear Judge Caproni:

On behalf of plaintiff Hugh M. Rhoden, Sr. ("Plaintiff") and defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively, "Bard") (all, collectively, the "Parties") in the above-referenced matter (the "Action"), and pursuant to the Court's March 31, 2021 Order, the Parties submit this joint letter to inform the Court of the status of the settlement in principle in this action.

The parties are in the process of finalizing their settlement and obtaining the plaintiff's agreement to terms. Although the parties have made significant progress, they believe that this will take some time given the volume and complexity of cases involved. Accordingly, the parties jointly and respectfully request that the Court enter an order continuing the stay in this action for an additional ninety (90) days to permit the parties to finalize the settlement. If plaintiff has not filed dismissal papers within 90 days from the stay extension being granted, the parties request the opportunity to file a joint status report regarding the settlement.

Alternatively, the parties respectfully request that the case be administratively closed without prejudice and placed on a suspense calendar with a status report deadline that the Court deems appropriate.

Application GRANTED. A status update is due by
October 1, 2021.

Respectfully Submitted,

/s/ David P. Matthews

David P. Matthews

SO ORDERED.



7/1/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

cc: Timothy E. Di Domenico, Esq.